

Defendant Planned Parenthood Federation of America (“PPFA”) hereby moves pursuant to Federal Rules of Civil Procedure 12(b)(2) and 12(b)(5) to dismiss Relator’s Complaint and the State of Texas’ Complaint in Intervention for improper service of process. In support of its Motion, PPFA respectfully refers the Court to its Memorandum in Support.

WHEREFORE, PPFA respectfully moves that this Honorable Court dismiss Relator’s Complaint and the State of Texas’ Complaint in Intervention for improper service.

REQUEST FOR HEARING

Defendants request a hearing to assist the Court with its consideration of this matter.

Dated: February 14, 2022

Respectfully submitted,

ARNOLD & PORTER KAYE SCHOLER
LLP

By: /s/ Craig D. Margolis
Craig D. Margolis
Craig.Margolis@arnoldporter.com
Tirzah Lollar
Tirzah.Lollar@arnoldporter.com

601 Massachusetts Ave, NW
Washington, DC 20001-3743
Telephone: +1 202.942.6127
Fax: +1 202.942.5999

601 Massachusetts Ave, NW
Washington, DC 20001-3743
Telephone: +1 202.942.6199
Fax: +1 202.942.5999

Christopher M. Odell
Texas State Bar No. 24037205
Christopher.Odell@arnoldporter.com

700 Louisiana Street, Suite 4000

Houston, TX 77002-2755
Telephone: +1 713.576.2400
Fax: +1 713.576.2499

Attorneys for Defendants

CERTIFICATE OF SERVICE

I hereby certify that on February 14, 2022, the foregoing document was electronically filed with the Clerk of Court using CM/ECF.

/s/ Craig D. Margolis
Craig D. Margolis